

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA

CLERK'S OFFICE U.S. DIST. COURT
AT ABINGDON, VA
FILED

NOV 22 2021

JULIA C. DUDLEY, CLERK
BY: *A. Meade*
DEPUTY CLERK

MELINDA SCOTT,)

)

PLAINTIFF.)

)

V.)

CL NO. 2:20cv14

)

WISE CO. DSS,)

ET AL.,)

)

DEFENDANTS.)

MOTION TO SHOW CAUSE

FACTS

1. On November 1, 2021, Plaintiff Scott filed a Motion to Seal.
2. On Wednesday, November 16, 2021, the district court ordered Defendant Moon's counsel to submit a redacted copy of Docket #99-3. The court order Defendant Moon's counsel to redact the "address and any other personal identifiers" on Docket #99-3. The "personal identifiers" named in the Motion to Seal were: (1) the Plaintiff and her minor children's residential address, (2) the Plaintiff and her children's county of residence, (3) the Plaintiff's places of employment or business (4) the Plaintiff's place of attendance at any graduate

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school (5) the Plaintiff's make, model, year of vehicles (6) her children's whereabouts and (7) any other identifying information such as social security numbers, etc

3. On November 16, 2021, Counsel for Defendant Moon submitted a redacted copy of Exhibit #99-3 marking out only the address (docket #110)
4. On November 16, 2021, an anonymous user under the name of "Useful_Mistake" posted an unredacted copy of Exhibit #99-3 in order to circumvent the court's order to redact the information.
5. Users of KiwiFarms.net show a preference for emails ending in "@protonmail.com"
6. Matthew Hardin, counsel for Defendant Moon, uses an email address "matthewhardin@protonmail.com"

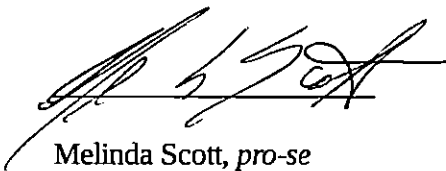
Cause of Motion

On November 16, 2021, Counsel for Defendant Moon submitted a redacted copy of Exhibit #99-3 marking out only the address (docket #110). He failed to mark out any other personal identifiers such as vehicle make and model, etc. Further he did not remove Exhibit #99-3 from the Docket.

It is plausible that "Useful_Mistake" is iMatthew Hardin, Counsel for Defendant Moon. Plaintiff Scott has requested a Subpoena to be sent to Joshua Moon surrendering the IP information of anonymous user "Useful_Mistake" to confirm that Matthew Hardin, Counsel for Defendant is in fact that particular anonymous user who posted an unredacted copy of Exhibit #99-3 on KiwiFarms.net.

COMES NOW, the Plaintiff, Melinda Scott, and requests that this court order Defendant Moon's counsel to show (a) why he did not comply with the court's order of November 16, 2021 to redact personal identifiers (in addition to the address) and (b) answer for his failure to remove Exhibit #99-3 from the Docket and (c) answer for why he filed the unredacted copy online under a profile named "Useful_Mistake" (on KiwiFarms.net).

I ASK FOR THIS,

A handwritten signature in black ink, appearing to read 'Melinda Scott', written over a horizontal line.

Melinda Scott, *pro-se*

PO BOX 1133-2014PMB87 (VA ACP address)

Richmond, VA 23218

540-692-2342

msscottw@gmu.edu

CERTIFICATE OF SERVICE

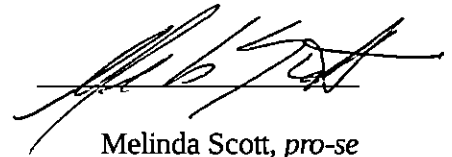
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I certify that I have mailed a copy of this MOTION FOR INJUNCTION to Counsel for the Defendant, Matthew D. Hardin, VSB #87482, 1725 I Street NW, Suite 300, Washington, D.C., 20006, and at matthewdhardin@gmail.com on this 19th day of NOV., 2021.

SIGNED,

A handwritten signature in black ink, appearing to read 'Melinda Scott', written over a horizontal line.

Melinda Scott, *pro-se*

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